

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**Cambridge Electric Light Company
and Commonwealth Electric Company,
d/b/a NStar Electric**

D.T.E. 04-60

**ATTORNEY GENERAL'S
SECOND SET OF DOCUMENT AND INFORMATION REQUESTS**

INSTRUCTIONS

1. These Document and Information Requests call for all information, including information contained in documents, which relates to the subject matter of the requests and which is known or available to Cambridge Electric Light Company and Commonwealth Electric Company, d/b/a NSTAR Electric ("NSTAR Electric" or "Company"), or to any individual or entity sponsoring testimony or retained by the Company to provide information, advice, testimony or other services in connection with this proceeding.
2. Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part, or portion. Any objection to a Request should clearly indicate the subdivision, part, or portion of the Request to which it is directed.
3. If information requested is not available in the exact form requested, provide such information or documents as are available that best respond to the Request.
4. These requests are continuing in nature and require supplemental responses when further or different information with respect to the same is obtained.
5. Each response should be furnished on a separate page headed by the individual Request being answered. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.
6. Each Document and Information Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a

document is self-identifying, it need not be separately identified.

7. For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recordation system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.
8. If a Document and Information Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.
9. If the Company cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the Company cannot answer the Request in full, and state what information or knowledge is in the Company's possession concerning the unanswered portions.
10. If, in answering any of these Document and Information requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.
11. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.
12. Provide copies of all requested documents. A response which does not provide the Attorney General with the responsive documents, and requests the Attorney General to inspect documents at any location is not responsive.
13. If you refuse to respond to any Document and Information Request by reason of a claim of privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.
14. Each request for information includes a request for all documentation which supports the response provided.
15. Provide two copies of each response to the Attorney General.

16. Unless the Request specifically provides otherwise, the term "Company" refers to NSTAR Electric's intrastate operations and includes all witnesses, representatives, employees, and legal counsel.
17. Please furnish each response on a separate sheet of paper, beginning with a restatement of the question.
18. Please provide all responses to requests within the time specified by the Hearing Officer.

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**Cambridge Electric Light Company
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D.T.E. 04-60

**ATTORNEY GENERAL'S SECOND SET OF
DOCUMENT AND INFORMATION REQUESTS**

The following is the Attorney General's Second Set of Document and Information Requests in the above referenced docket.

- AG-2-1 Please provide the explanation of why the Pittsfield unit's capacity factor recently has averaged only 27%. Hevert Testimony p. 26.
- AG-2-2 Please provide the Pittsfield plant's monthly capacity factor for the period January 1996 to the most recent month available.
- AG-2-3 Please provide a recalculation of Exhibits RBH-5 and RBH 6 assuming that the Company took its full annual entitlements (kW and kWh) under the original terms of the PPA.
- AG-2-4 Please provide a recalculation of Exhibits RBH-5 and RBH-6 adjusted only to reflect the currently prevailing fuel prices for the entire period of the analysis.
- AG-2-5 Please provide a copy of the "escalated gas, oil, and coal indices", (including their source) that were used in the calculations of the Energy Charge shown in Column 2 of Exhibit RBH-6 on both pages 2 of 5 and 3 of 5.
- AG-2-6 Please provide a copy of "CPI escalation factor[s]" (including their source) used in the calculations of the Capacity Charge shown in Column 3 of Exhibit RBH-6 on both pages 2 of 5 and 3 of 5.
- AG-2-7 Please provide the "Contracted KW entitlement[s]" used in the calculations of the charges shown in Columns 3, 5 and 6 of Exhibit RBH-6 on both pages 2 of 5 and

3 of 5.

- AG-2-8 Is the Pittsfield plant currently being dispatched pursuant to the provisions of the PPA? If so, provide a reference to the provisions of the PPA which are governing the dispatch the units. If not, provide an explanation of how the units are being dispatched including the name the party that is currently controlling the dispatch of the units.
- AG-2-9 Please provide the “Contracted Annual Gas Transportation Demand Charge” used in the calculations of the Gas Transportation Charges shown in Columns 5 of Exhibit RBH-6 on both pages 2 of 5 and 3 of 5.
- AG-2-10 Please provide the “Availability Factor” used in the calculations of the charges shown in Columns 5 and 6 of Exhibit RBH-6 on both pages 2 of 5 and 3 of 5.
- AG-2-11 Please provide a copy of contract containing the “contracted annual transmission charge” used in the calculations of the Transmission Charge shown in Columns 7 of Exhibit RBH-6 on page 2 of 5
- AG-2-12 Please provide the Seller’s minimum annual KWh delivery obligation under the terms of the PPA. Include the citation to the contract term that governs.
- AG-2-13 Explain the differences between the annual Gas Transportation Charges shown in Column 5 of Exhibit RBH-6 pages 2 of 5 and Column 5 of Exhibit RBH-6 page 3 of 5.
- AG-2-14 Explain the differences between the annual Energy Charges shown in Column 2 of Exhibit RBH-6 pages 2 of 5 and Column 2 of Exhibit RBH-6 page 3 of 5..
- AG-2-15 Please provide an explanation of why there are no charges in Columns 3 through 7 of Exhibit RBH-6 for years 2009 through 2011 with a reference to the Section(s) of the of the PPA that produce this result.
- AG-2-16 Refer to Appendix A and B, the Termination Agreements, Section 5, Releases. Please provide the amount of currently outstanding or anticipated PPA Refunds.
- AG-2-17 Please provide a copy of the invoices for the cost of transmission services for the output of the Pittsfield Units to Cambridge Electric for the calendar years 2002 and 2003.
- AG-2-18 A copy of the Northeast Electricity and Gas Forecasts relied upon in the derivation of Exhibit NSTAR-RBH-6
- AG-2-19 For each column of Exhibit NSTAR-RBH-6 that was derived using the Northeast

Electricity and Gas Forecasts, Please provide a reference to where the data relied upon can be found in the Northeast Electricity and Gas Forecasts.

- AG-2-20 A copy of the “documentation CD-ROM that include[s] all of the PPA Entitlement agreements and amendments as well as the associated invoices and [the electronic contract evaluation spreadsheet for each of the PPA Entitlements. See Hevert Testimony, p. 14, lines 3-6.
- AG-2-21 Please provide copies of invoices rendered by Altresco Pittsfield, L.P. or Pittsfield Generating Company, L.P. to Cambridge Electric Company and Commonwealth Electric Company for service rendered during the years 1997 through 2004.
- AG-2-22 Please provide a copy of all written agreements (or a description of any oral agreements) entered into between the Parties pursuant to Section 6.4 of the PPA (added by the Second Amendment To Power Purchase Agreement).
- AG-2-23 Please provide an explanation and analysis of the extent to which Total KWh shown in Column 1 of Exhibit RBH-6 on both pages 2 of 5 and 3 of 5 anticipate the execution of agreements between the Parties pursuant to Section 6.4 of the PPA (added by the Second Amendment To Power Purchase Agreement).
- AG-2-24 Please provide a calculation of each Companies’ minimum amount of power that is required to be purchased under the terms of the PPA for each year during the period 2004 through 2011 before any adjustments pursuant to the provisions of Section 6.4.
- AG-2-26 Please provide a calculation of the present value of savings to customers of the contract terminations assuming the existing entitlements were used to serve the Companies’ Default Service load during the period March 1, 2005 through December 31, 2011. Quantify all products associated with the Companies’ entitlements that would benefit Default Service customers (ICAP, reserves and other ancillary services, etc.). Provide the results and all underlying calculations in the form of a working spread sheet model. Include all supporting workpapers, calculations, documentation and assumptions. The response should include recalculations of Exhibits NSTAR-CAM/COM-GOL-2 through 8 and additional schedules comparable to Exhibits NSTAR-CAM/COM-GOL-7 and 8 for Default Service, years 2005 through 2011.
- AG-2-27 Refer to Exhibit NSTAR-GOL, p. 14. Please provide the CEA purchased power forecasts. Include all supporting documentation, calculations and assumptions. If the forecast has been updated, provide the updates and supporting documentation.

Dated: July 22, 2004